

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA      )  
                                      )  
                                      )  
v.                                 ) CRIMINAL ACTION NO.  
                                      )  
                                      )  
ROBERT DOHERTY                 ) 1:21-CR-00184-TWT-CCB

**CONSENT MOTION TO CONTINUE PRETRIAL CONFERENCE  
AND FOR ADDITIONAL TIME TO FILE PRETRIAL MOTIONS**

COMES NOW Defendant, Robert Doherty, by and through undersigned counsel, and moves this Court for an additional month to file pretrial motions in this case – until August 20, 2021. Defendant also requests that the Pretrial Conference be postponed until after motions are due. In support of this motion, counsel shows the following:

1.

Counsel has not had an opportunity to discuss discovery and pretrial motions with Mr. Doherty because counsel has not received all of the discovery from the government. In addition, plea negotiations are ongoing and may obviate the need for pretrial motions or hearings.

2.

Counsel is requesting that the Pretrial Motions in this case not be due until August 20, 2021 and that the Pretrial Conference be held after that date. Counsel

asks for the additional time because of the need to adequately represent the Defendant.

3.

AUSA Ryan Buchanan consents to the granting of this motion.

**WHEREFORE**, Defendant requests that this Court grant his request for a continuance of time within which to file his pretrial motions until August 20, 2021, and to reset the Pretrial Conference thereafter.

Dated this 19<sup>th</sup> day of July, 2021.

Respectfully submitted,

*s/ Mildred Geckler Dunn, Esq.*  
MILDRED GECKLER DUNN  
State Bar Number: 323373  
Attorney for Robert Doherty

Federal Defender Program, Inc.  
Suite 1500; Centennial Tower  
101 Marietta Street NW  
Atlanta, Georgia 30303  
404/688-7530  
[millie\\_dunn@fd.org](mailto:millie_dunn@fd.org)